

Sheri Thome, Esq.  
Nevada Bar No. 08657  
**WILSON, ELSER, MOSKOWITZ,  
EDELMAN & DICKER LLP**  
6689 Las Vegas Blvd. South  
Suite 200  
Las Vegas, NV 89119  
Tel: (702) 727-1400 Fax: (702) 727-1401  
[sheri.thome@wilsonelser.com](mailto:sheri.thome@wilsonelser.com)  
*Attorneys for Plaintiff Noetic Specialty Insurance Company*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

NOETIC SPECIALTY INSURANCE COMPANY, CASE NO: 3:20-cv-00110-LRH-EJY

Plaintiff,

v.

O'MARA LAW FIRM, P.C., a Nevada Professional Corporation; DAVID O'MARA, an individual; EDWARD C. WOOLEY and JUDITH WOOLEY, individually and as trustees of the EDWARD C. WOOLEY and JUDITH WOOLEY INTERVIVOS REVOCABLE TRUST 2000; LARRY J. WILLARD, individually and as trustee of the LARRY JAMES WILLARD TRUST FUND; OVERLAND DEVELOPMENT CORPORATION, a California Corporation,

Defendants.

**STIPULATION FOR EXTENSION OF  
TIME FOR WILLARD DEFENDANTS  
TO ANSWER COMPLAINT PENDING  
SETTLEMENT DISCUSSIONS**

**(FIRST REQUEST)**

**WHEREAS**, Plaintiff Noetic Specialty Insurance Company ("Plaintiff") filed its Complaint against the Defendants on February 18, 2020.

**WHEREAS**, on March 9, 2020, Defendants (a) Larry J. Willard, individually, and Larry J. Willard, as Trustee of the Larry James Willard Trust Fund, and (b) Overland Development Corporation, a California Corporation (collectively, "Willard Defendants"), accepted service of Plaintiff's Complaint.

**WHEREAS**, the Willard Defendants' accepted service of the Complaint and the original deadline to answer, or otherwise respond to, Plaintiff's Complaint was April 23, 2020. (See March 9, 2020 Acceptance of Service.)

1       **WHEREAS**, despite difficult logistical complications due to the Covid-19 pandemic, the  
2 parties have diligently pursued settlement discussions and made substantial progress on a global  
3 settlement in just the past two weeks.

4       **WHEREAS**, the Plaintiff has agreed to extend the deadline to respond, or otherwise plead to  
5 its Complaint, up to and including Friday, May 22, 2020, and good cause exists for such a limited  
6 extension of time.

7       **IT IS HEREBY STIPULATED AND AGREED** by and between the undersigned, that the  
8 Willard Defendants shall have to and including Friday, May 22, 2020, to answer or otherwise  
9 respond to Plaintiff's Complaint.

10       **IT IS SO STIPULATED:**

11       DATED this 8<sup>th</sup> day of May, 2020.

DATED this 8<sup>th</sup> day of May, 2020.

12       WILSON, ELSER, MOSKOWITZ,  
13       EDELMAN & DICKER LLP

ROBERTSON, JOHNSON  
MILLER & WILLIAMSON

14       /s/ Sheri Thome  
15       Sheri Thome, Esq.  
16       Nevada Bar No. 08657  
17       6689 Las Vegas Blvd. South  
18       Suite 200  
19       Las Vegas, NV 89119  
20       Attorneys for Plaintiff Noetic Specialty  
21       Insurance Company

/s/ Jonathan Joel Tew  
Richard D. Williamson, Esq.,  
Nevada Bar No. 9932  
Jonathan Joel Tew, Esq.  
Nevada Bar No. 11874  
50 West Liberty Street, Suite 600  
Reno, Nevada 89501  
Attorneys for Larry J. Willard, individually and  
as Trustee of the Larry James Willard Trust  
Fund and Overland Development Corporation

22       **ORDER**

23       **IT IS SO ORDERED.**

24         
25       UNITED STATES MAGISTRATE JUDGE

26       DATED: May 12, 2020